Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Framework for Next Generation 911 Deployment	)	PS Docket No. 10-255
	)	

REPLY COMMENTS OF VERIZON AND VERIZON WIRELESS

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TABLE OF CONTENTS

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Verizon and Verizon Wireless hereby reply to comments filed in response to the Notice of Inquiry in the above-captioned proceeding.[2] The companies share the Commission's vision of Next Generation 911 ("NG911") being available to the entire nation, and commend the Commission's efforts to better understand NG911 architecture, the applications it will support, and the measures that PSAPs, service providers, and other stakeholders must undertake to successfully deploy NG911.[3]

I. INTRODUCTION AND SUMMARY

As the Commission and numerous commenters have recognized, broadband deployment and IP-enabled communications platforms have enormous potential to further enhance the public safety benefits consumers derive from their communications services and devices today. In addition to Verizon's and Verizon Wireless' extensive experience in deploying wireline and

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1 In addition to Verizon Wireless, the Verizon companies participating in this filing ("Verizon") are the regulated, wholly-owned subsidiaries of Verizon Communications Inc.

2 *Framework for Next Generation 911 Deployment*, Notice of Inquiry, PS Docket No. 10-255, FCC 10-200 (rel. Dec. 21, 2010) ("NOI").

3 *See id.* at ¶ 30.

wireless 911 and enhanced 911 ("E-911") services to consumers, Verizon is a market leader in this emerging space as it is actively developing services that utilize such platforms. Just last month, Verizon and Intrado announced a strategic business arrangement whereby a Verizon IP-enabled platform will provide an important building block of a future comprehensive NG911 system.[4]

The Commission too has an important role in promoting the transition to NG911. The Commission should support collaborative standards-driven efforts among stakeholders to promote the rapid deployment of NG911 via a robust end-to-end NG911 architecture involving upgrades to the network capabilities of service providers and PSAPs alike. This end-to-end approach will promote the Commission's objectives more effectively than interim and limited solutions for SMS, which has various limitations, such as location determination and security, that render it an inappropriate technology for 911 communications.

Because the interests of all stakeholders would be best served by targeting resources toward a single, uniform effort to deploy a comprehensive, reliable NG911 network, the Commission should continue to support the various standards organizations that have made enormous progress toward this objective. Verizon and Verizon Wireless and have long been (and remain) engaged in these efforts. Both participated in the Network Reliability and Interoperability Council VII in 2004-2005, and remain active in the Communications Security, Reliability and Interoperability Council ("CSRIC"), NENA's NG911 standards development efforts, and the Emergency Access Advisory Committee ("EAAC"). The Commission should

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[4] *See* News Release, *Verizon and Intrado Join Forces to Deploy Next-Generation 911 Services Nationwide*, Feb. 15, 2011, available at http://newscenter.verizon.com/press-releases/verizon/2011/verizon-and-intrado-join.html.

also encourage and participate in efforts among all stakeholders to educate consumers about the limits of current and future 911 technologies, including individuals with disabilities.

Moreover, IP network performance, security and quality of service in the underlying transport network will be critical to the reliability of NG911 services. Rather than impose regulatory mandates, the Commission should support efforts to standardize end-to-end protocols, and promote policies that enable service providers to efficiently deploy reliable and resilient next generation wireless and wireline networks. NG911 networks should support services and devices that are appropriate for emergency communications in a manner that reflects technical feasibility, PSAPs' capabilities, and reasonable consumer expectations. The Commission should be wary of technical mandates relating to location capability and international roamers.

At the same time, the Commission should ensure that standards and regulatory obligations are applied uniformly through a nationwide framework and work with Congress and the states, where appropriate, to make certain that service providers have sufficient liability protection to allow them to provide a broad array of NG911 options. Finally, the Commission should not adopt regulations that might discourage the robust competition in the provisioning of 911 services to PSAPs that exists today.

II. THE COMMISSION SHOULD PROMOTE RAPID DEPLOYMENT OF NG911 RATHER THAN INTERIM AND LIMITED SOLUTIONS FOR SMS

A. *Deployment of an End-to-End NG911 Architecture Requires a Fundamentally Different Technology and Regulatory Framework than Wireless E-911*

Wireless and wireline E-911 services build upon traditional circuit-switched architecture and the "legacy components that place significant limitations on the functions that can be

performed over the network."[5] In order to meet Commission-imposed deadlines, the deployment of wireless E-911 solutions required service providers to work with vendors to engineer the transmission of voice and call data in a manner that circumvented the capacity and other technical limitations of PSAPs' networks.[6]

This approach may have had some policy outcomes that the Commission favored at the time, such as limiting PSAPs' own deployment costs.[7] A robust, reliable NG911 architecture, that builds upon and is interoperable with commercial IP-based platforms, will require implementation of an end-to-end solution, including at the PSAP, to support different text-based services such as real-time text ("RTT").[8] The Commission's carrier-focused regulatory framework reflected in the wireless E-911 rules thus will not facilitate the rapid deployment of a comprehensive end-to-end NG911 system.[9]

B. ***NG911 Deployment Should Use IP Platforms and 4G Wireless Technologies***

The 911/E-911 services consumers have come to take for granted were deployed upon, and benefited from, highly reliable, redundant voice-based networks. A similarly reliable IP-based commercial and PSAP architecture is necessary if NG911 is to achieve or exceed the

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5 *See* NOI at ¶ 14. As noted in the NOI, wireless carriers have implemented E-911 via "enhancements or 'add-ons' to existing Wireline E911 networks." *Id.* at ¶ 15.

6 *See* T-Mobile Comments at 2-3.

7 *See Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request of King County, Washington*, Order on Reconsideration, 17 FCC Rcd 14789, ¶ 4 (2002) (defining and describing wireless carriers' and PSAPs' cost and facilities responsibilities under the wireless E-911 rules).

8 *See* AT&T Comments at 16-17; Qualcomm Comments at 9-10.

9 *See* T-Mobile Comments at 4 (noting there is no selective router in the NG911 environment to form a demarcation between the PSAP's and service provider's responsibilities).

success of voice-based 911/E-911 services. Thus, the interests of consumers and government stakeholders at the Federal, state and local levels, as well as service providers, would be better and more efficiently served by targeting personnel, time and monetary resources toward a single, uniform effort to deploy a comprehensive, reliable NG911 network.[10]

Verizon, Verizon Wireless, and others in the telecommunications industry are working closely with NENA and other standards bodies such as the 3rd Generation Partnership Project ("3GPP") and ATIS to define the capabilities of NG911 networks and PSAP capabilities that will work with IP-based platforms and LTE wireless technology.[11] Significant activities are under way to develop a uniform approach for the delivery of non-voice emergency services ("NOVES"), including the use of messaging for emergency services. RTT, which will be feasible for NG911 networks and consumer equipment, is still undergoing assessment but has been standardized by 3GPP as the optimal replacement for legacy TTY/TDD devices in 4G wireless communications networks. The Commission should support and monitor these efforts, and not be distracted by less effective interim measures.

C. *SMS Should Be Part of an End-to-End NG911 Service Using 4G Wireless Technologies*

Many commenters argue that PSAPs and service providers should also support SMS communications before NG911 is available, at least on an interim basis.[12] Yet existing wireless

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10 *See* AT&T Comments at 11; CTIA Comments at 5-6; Sprint Nextel Comments at 5; T-Mobile Comments at 13; *see also* NENA Comments at 14 ("NENA anticipates that 4G mobile networks using more advanced text messaging protocols will eventually render SMS obsolete").

11 *See* ATIS Comments at 8; CTIA Comments at 5-6; T-Mobile Comments at 2.

12 *See* Intrado Comments at 13; RERC-TA Comments at 2, 5; Rave Mobile Safety Comments at 2; Comments of L.R. Kimball at 3-7; TCS Comments at 5-7.

networks and PSAP capabilities cannot deliver SMS messages to PSAPs with the same reliability as voice calls. Thus, PSAPs', consumers' and service providers' interests all would be better served by focusing on incorporating RTT and more advanced messaging technologies into IP-based platforms and into the wireless industry's deployment of 4G LTE technology.

Several commenters demonstrate that the network and signaling configurations that service providers use for SMS messages are neither designed nor appropriate for emergency communications. As the Alliance for Telecommunications Industry Solutions ("ATIS") explains, the use of signaling control channels and the "transaction-based nature of the communication" are, by design, intended to give priority in the network to voice traffic, leaving SMS a "best efforts" service with respect to reliability and priority.[13] The store and forward functionality of SMS – which is necessary for service providers to manage traffic efficiently over their networks – precludes the use of SMS as a session-based, real-time emergency communications service.[14]

Moreover, unlike 911 calls, which can be completed by a non-service initialized handset that is compatible with a provider's network and air interface protocol, transmission of SMS messages requires an active service account. And "[e]xisting handsets are not equipped to designate a text message as an emergency communication, so changes to handsets would be

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[13] *See* ATIS Comments at 6; *see also* AT&T Comments at 12-13; T-Mobile Comments at 9; Comments of Verizon and Verizon Wireless in PS Docket No. 07-114 and WC Docket No. 05-196, filed Jan. 19, 2011, at 11 ("Verizon/Verizon Wireless E-911 Comments").

[14] As several commenters explained, the lack of a session-based communication precludes a PSAP from correlating multiple messages from the same caller; messages may be experience delays in delivery due to network congestion; messages may be delivered out of order – and indeed may be lost. *See* ATIS Comments at 7; T-Mobile Comments at 9, 11-12; *see also* APCO Comments at 4 (noting "Quality of Service concerns with the use of SMS to 911"); Texas 9-1-1 Agencies 4, 7 (advocating SMS support in an *NG911* environment).

necessary if SMS and MMS were to be used for 911 purposes."[15] Verizon and Verizon Wireless further explained in their comments filed earlier in 2011 that "the handset enters emergency mode when a user dials 911" which "allows the handset to lock onto the strongest signal ..., overrides location privacy settings, and initiates an origination request for call routing and location recognition."[16] An SMS message triggers none of these mechanisms.

Also, SMS platforms are not integrated with location determination capabilities in a manner that facilitates either the appropriate routing of emergency calls to PSAPs or the provision of caller location information to the PSAP.[17] SMS traffic is routed to the specific called number without regard to location, and the SMS network does not have the ability to query the location platform to determine the appropriate PSAP to receive the call or provide latitude/longitude data to the PSAP. Because handsets cannot recognize a particular SMS message as an emergency call, the handset and the network will not employ the A-GPS solution and generate a location "fix." Nor are SMS short codes a solution, as SMS platforms are only designed to transmit short codes to a single location.[18]

Finally, SMS communications are not designed or configured with the same security safeguards as voice-based services. While the enhanced call management capabilities of an

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15 Sprint Nextel Comments at 3.

16 *See* Verizon/Verizon Wireless E-911 Comments at 11.

17 *See* AT&T Comments at 14; *see also* Verizon/Verizon Wireless E-911 Comments at 11; Sprint Nextel Comments at 3; T-Mobile Comments at 10. As ATIS explains, however, "current SMS standards do not support the most critical elements of an emergency communications network – automatic routing to the designated public safety answering point ("PSAP"), the automatic provision of a sender's location information to the PSAP, reliability or priority." *See* ATIS Comments at 5; *see also* T-Mobile Comments at 10; Intrado Comments at 11-12.

18 *See* AT&T Comments at 13; ATIS Comments at 7-8; T-Mobile Comments at 9 n.20.

NG911 network could enable PSAPs to mitigate the risk of prank or malicious calls,[19] such capabilities are not present for SMS technology because service providers currently have no ability to authenticate SMS messages to determine their validity.[20] Such vulnerabilities have significant implications for the value and effectiveness of SMS messages for PSAPs.

Verizon Wireless has investigated the viability of emerging proposals such as the use of a third party gateway or the conversion of SMS to TTY ("TTY Emulation") that would utilize third generation ("3G") networks, but unlike voice-based services, these still amount to "best efforts" with respect to performance and reliability. Even if technically feasible, mandating that PSAPs and service providers incorporate SMS messages into the current 911/E-911 framework as an interim measure would require that PSAPs and service providers implement not just a single upgrade to NG911, but yet another costly initial upgrade of limited duration and still limited reliability.[21]

D. *The Commission Should Encourage and Actively Participate in Consumer and Stakeholder Education Efforts Concerning the Limits of Both Non-Voice Communications and Inconsistent NG911 Systems*

A number of commenters underscore the critical need to educate consumers about the limits of current and future 911 technologies.[22] In the immediate term, such efforts include

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19 *See* AT&T Comments at 8, 34.

20 *See* T-Mobile Comments at 10-11.

21 *See* AT&T Comments at 13-14; CTIA Comments at 5; T-Mobile Comments at 2, 13.

22 *See* APCO Comments at 8; AT&T Comments at 15, 33; ATIS Comments at 9; CTIA Comments at 15-16; Motorola Solutions Comments at 5; NENA Comments at 14-15; Sprint Nextel Comments at 5; T-Mobile Comments at 13-14, n.34; *see also* District of Columbia Office of United Communications Comments at 19 ("[t]he younger generation is not always fully aware of the lack of SMS support"); Qualcomm Comments at 10-11; Texas 9-1-1 Agencies Comments at 9.

educating consumers about the limits of existing technologies such as SMS and the need for continued reliance on voice-based 911 services.

The staggered deployment of NG911 at the regional and local levels due to inconsistent PSAP technical and call handling capabilities will create technical and customer care challenges for service providers. These include call routing and the nature of the message sent back to the end user responding to text-based communication where a particular PSAP might not yet be able to support NG911 or a particular NG911 feature. While standards will likely address some of those issues, consumers' lack of knowledge concerning how and whether a particular PSAP can receive and process a particular call or message raises significant public safety concerns given the mobile or nomadic capabilities of many communications services today.

The Commission should thus work in conjunction with public safety organizations, service providers, and other stakeholders – notably organizations representing individuals with disabilities – to minimize existing and future customer confusion.

E. *The Commission Should Encourage Collaborative Standards Development and Refrain from Imposing New Regulatory Burdens.*

The Commission seeks comment on a number of issues regarding "the mechanisms that will be used to transport digital content across NG911 networks."[23] Verizon and Verizon Wireless agree with AT&T and other commenters that IP network performance, security and quality of service in the underlying transport network will be critical to the reliability of NG911 services.[24] Just as the reliability, resiliency and security of wireline and wireless voice networks and services remain integral to the success of voice-based 911 and E-911 services, so too will the

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23 *See* NOI at ¶ 49.

24 *See* AT&T Comments at 16-17; ATIS Comments at 2; Qualcomm Comments at 8-9.

reliability and interoperability of commercial IP networks be integral to the effectiveness of PSAPs' NG911 networks and services.

To that end, the Commission should support stakeholder efforts to standardize end-to-end protocols, and promote policies that enable service providers to efficiently deploy reliable and resilient next generation wireless and wireline networks.[25] Regulatory mandates are particularly unnecessary given the tremendous progress of industry and public safety stakeholders in developing consensus-based standards for NG911. As discussed above, numerous standards groups, including NENA, the IETF (Internet Engineering Task Force), ATIS, and 3GPP are actively working on completing the necessary standards for NG911. Verizon and Verizon Wireless are actively participating in these efforts. Much has been accomplished in the past five years since NENA released its document for the Interim VoIP Architecture for E9-1-1 Services.[26] While a variety of issues must still be addressed concerning important media types such as RTT, video, and telematics, in light of the substantial progress that has been made by the public safety industry and providers to date in developing standards, the Commission should allow consideration of the remaining issues to follow the same collaborative process.

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25 *See* AT&T Comments at 17.

26 Some key accomplishments include the agreement and publication of the following reports: (i) ATIS-0500017 - Technical Report - "Considerations for an Emergency Services Next Generation Network (ES-NGN)"; (ii) ATIS-0500015 - Technical Report - "Parameter Conveyance for Location Determination of Devices Attached to Access Networks"; (iii) ATIS-0500002.2008 - American National Standard for Telecommunications - "Emergency Services Messaging Interface (ESMI)"; (iv) ATIS-0500019.2010 - American National Standard for Telecommunications - "Request for Assistance Interface (RFAI) Specification"; and (v) 3GPP-TS23-167 V10 - "Technical Specification Group Services and System Aspects; IP Multimedia Subsystem (IMS) Emergency Services (REL10).

F. *NG911 Networks Should Support Services and Devices that Are Appropriate for Emergency Communications*

NG911 networks should support the services and devices that are appropriate for emergency communications. In that regard, Verizon and Verizon Wireless agree with numerous commenters that the underlying NG911 network can best serve consumers' public safety interests if stakeholders focus their standards and deployment efforts on those end-user devices and services that are most suitable for such communications.[27] Thus, the Commission should not require that NG911 systems support the entirety of the consumer devices and services described in the NOI.[28] Also, while the NOI accurately explains that the capabilities of products and services offered by device manufacturers and other stakeholders are critical in an NG911 environment, this fact does not necessitate the imposition of technical standards, labeling and certification requirements for the broad classes of consumer equipment described in the NOI.[29] As several commenters explain, such requirements could have a chilling effect on innovation in devices and services,[30] and result in consumer confusion, particularly given the availability of over-the-top applications over which service providers and device manufacturers have no

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27 *See* AT&T Comments at 17-20; ATIS Comments at 17-18; District of Columbia Office of Unified Communications Comments at 23-24 ("[o]nly devices that have a network capability of also placing a voice call should be allowed in the near future"); Joint Comments of International Association of Chiefs of Police et al. at 4 (opposing direct 911 calls from various consumer devices).

28 *See* NOI at ¶ 52 (noting that a myriad of electronic devices "will have communication capabilities" and asking whether "every consumer device with Internet or cellular connectivity and a suitable interface have the ability to request emergency assistance")

29 *See id.* at ¶ 52 (asking whether devices should "be certified and labeled as 911-capable").

30 *See* AT&T Comments at 18, 20; CEA Comments at 5-7; Sprint Nextel Comments at 6; *see also* CTIA Comments at 3 (leave standards development to standards bodies).

control.[31] These factors all militate in favor of a targeted approach toward covered services and devices that accounts for reasonable consumer expectations.

As a related matter, NG911 deployment will be dependent on the capabilities and resources of local or regional PSAPs. Requiring that NG911 support all of the various media formats and consumer devices described in the NOI will only impose costs on consumers and service providers, with no countervailing benefits, if PSAPs cannot handle the underlying data or message, and could potentially overwhelm PSAPs' technical and personnel capabilities during emergency situations.[32] The more targeted approach many commenters recommend would account for PSAPs' needs and capabilities in an NG911 environment and help prevent such an outcome.

In addition, incorporating location determination and emergency call completion capabilities into certain devices and communications technologies raises issues of technical feasibility.[33] As AT&T explains, "in most cases, there are no standardized interfaces that would allow access providers to locate non-traditional voice calls, such as VoIP calls or data sessions."[34] Providers of those services – not the providers of the broadband networks those services utilize – should bear the costs of developing solutions. Congress and the Commission

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31 *See* AT&T Comments at 17-18.

32 *See* AT&T Comments at 6; T-Mobile Comments at 8.

33 NOI at ¶ 76.

34 *See* AT&T Comments at 31-32.

have all recognized in various contexts that such public interest responsibilities should lie with the providers offering those services directly to consumers, and NG911 is no exception.[35]

Finally, the NOI seeks comment on whether there are any "regulatory changes" necessary to facilitate calls from international travelers calling 911.[36] Service providers have been able to resolve these issues through private contractual, standards-driven solutions, and Verizon Wireless agrees with ATIS that a similar approach, which has been developed through 3GPP, is preferable and should be available in an NG911 environment.[37]

III. THE COMMISSION SHOULD PROMOTE A CONSISTENT NATIONWIDE FRAMEWORK

The Commission should ensure that standards and any regulatory obligations are applied uniformly nationwide. The Texas 9-1-1 Agencies recommend a significant role for 9-1-1 authorities "determin[ing] whether certain NG9-1-1 capabilities and application (e.g., messaged-based text, real-time text, still images, real-time video) should be core or non-core elements, or primary or secondary media types," standardization, and the appropriateness of device-initiated communications.[38] While state, local and regional authorities should continue to participate in

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35 The Twenty-First Century Communications Accessibility Act provides an explicit exemption from liability in this regard. *See* Pub. L. 111-260, 124 Stat. 2751, § 2(a)(1) (2010) (exempting from liability a provider of advanced communications services to the extent that it merely "transmits, routes, or stores in intermediate or transient storage the communications made available through the provision of advanced communications services by a third party"). Moreover, under the Commission's various rules for interconnected VoIP providers, such as E-911 and universal service, the interconnected VoIP provider, not the underlying broadband Internet access provider, is subject to the obligations.

36 *See* NOI at ¶ 82.

37 *See* ATIS Comments at 18-19.

38 *See* Texas 9-1-1 Alliance Comments at 3, 11 and 13.

national standards-based efforts, a uniform nationwide approach to threshold issues such as supported services and standards is necessary to ensure the efficient and timely funding and deployment of NG911,[39] and to effectively inform consumers about the availability, benefits and limitations of emergency communications in an NG911 environment.

IV. LIABILITY ISSUES MUST BE ADDRESSED TO ENSURE THAT CONSUMERS CAN FULLY RECOGNIZE THE BENEFITS OF A ROBUST NG911 SYSTEM

The NOI seeks comment on a number of issues concerning PSAPs', service providers' and other stakeholders' potential liability exposure.[40] Verizon and Verizon Wireless agree with various commenters that liability protection must be afforded to service providers and PSAPs to ensure that the risks of litigation do not deter incentives to deploy NG911 systems and the commercial networks and services that support them.[41] Such risks could be particularly acute insofar as different PSAPs will have disparate capabilities, resulting in customer confusion about the emergency communications capabilities available through their service providers in the PSAP's service territory. To the extent that existing federal and state statutes do not adequately limit liability in these circumstances,[42] the Commission should work with Congress and the states to protect service providers and PSAPs alike.

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39 *See* CTIA Comments at 17.

40 *See* NOI at ¶¶ 71-73.

41 *See* APCO Comments at 9-10; AT&T Comments at 9, 25-26; CTIA Comments at 10-12; NENA Comments at 30-31; Sprint Nextel Comments at 8; TCS Comments at 17-18.

42 *See, e.g.,* Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, 113 Stat. 1286 (1999), as amended by the New and Emerging Technologies 911 Improvement Act of 2008, Pub. L. No. 110-283, 122 Stat. 2620 (2008) (codified at 47 U.S.C. § 615a).

V. THE COMMISSION SHOULD ENCOURAGE COMPETITION IN THE PROVISION OF NG911 SERVICES

Like other commenters, Verizon and Verizon Wireless support competition in the 911 marketplace and endorse a regulatory approach that allows today's competition to continue.[43] The market for providing 911-related services to PSAPs is highly competitive and innovative. As noted above, Verizon recently announced a collaborative effort to combine its global IP network and managed and professional services with Intrado's advanced 911 technologies to deliver calls and data services to emergency response personnel at PSAPs. The services will be provisioned via an IP-enabled communications platform able to support emerging and future NG911 capabilities. Verizon's reliable and secure IP backbone allows for the introduction of these new call-handling features. Verizon and Intrado have entered into a contract to provide these services to the Denco Area 911 District in North Texas starting in June, and anticipate that these services will be available nationwide later in 2011.

Innovative solutions such as these are necessary due to the significant competition that exists to provide 911 services to PSAPs, which can drive down PSAPs' costs due to facilities-based competition, and not by merely shifting costs from PSAPs to other stakeholders (such as originating service providers). NG911 could provide yet more competitive opportunities because IP networks are offered by a multitude of service providers across the U.S. and globally. Any service provider or integrator can choose to enter this market anywhere that IP networks can reach. In this regard, Verizon is not tethered to its ILEC territory and offers its 911 services to geographic areas outside its franchise areas. PSAPs will thus enjoy the lower prices that competition brings – which will be important for the many PSAPs expected to face funding

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[43] *See* NOI at ¶¶ 67-70; AT&T Comments at 30.

constraints related to new equipment purchases that could delay their transition to NG911. The Commission should encourage this competition to continue.

VI. CONCLUSION

For the foregoing reasons, Verizon and Verizon Wireless support standards-driven end-to-end NG911 deployment nationwide. The Commission should not require or otherwise promote the use of traditional SMS for emergency communications, but instead promote the deployment of reliable IP-based NG911 and commercial networks that support devices and services most suitable for emergency communications. The Commission should support comprehensive consumer education efforts, ensure that service provider liability issues are addressed, and allow competition in 911 service markets to continue.

Respectfully submitted,

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